

From: lmullan@sccoast.net

Sent: Wednesday, January 15, 2025 4:59 PM

To: Koscinski, John Cc: Phil Campisi

Subject: [EXTERNAL] Pandya, 8 Woodland Rd

Good afternoon John,

I trust the holidays went well and that everything is good by you!

May I suggest that you run the attached by the powers that be and ask them how they would like to address this supervening lien situation. Please advise them that because of our present special status it would be imprudent to, and we will not, pay it.

Thanks!

Best Regards,

Larry Mullan

Case 24-10440-amc Doc 66-2 Filed 01/29/25 Entered 01/29/25 18:01:08 Desc Exhibit B Page 2 of 7

Case 24-10440-amc Doc 66-2 Filed 01/29/25 Entered 01/29/25 18:01:08 Desc Exhibit B Page 3 of 7



2700 Horizon Drive, Suite 100 King of Prussia, PA 19406 www.portnoffonline.com P 866.211.9466

Notice of unpaid real estate taxes for the year 2023

And Notice of New Fee Schedule Applicable to All Open Accounts

TO: Southern Shoals

Date:	January 7, 2025
Property Address:	8 Woodland Road U Makefield Township, Pennsylvania
Tax Parcel Number:	47-008-007-007

Face	\$60,015.66
Penalty	\$6,001.57
Tax Claim Bureau Commission	\$3,300.86
Costs	\$8.44
Validation Notice	\$25.00
Notice Pursuant to 53 P.S. § 7106	\$40.00 + Postage
Balance Due as of January 7, 2025	\$69,407.33

Council Rock School District has hired Portnoff Law Associates, Ltd. (PLA) to collect this debt and prepare and provide this notice to you.

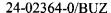
Please read the Contact and Payment Information and Options on page 3, which advises you of important information for responding to this notice, as well as additional information concerning your rights on page 4.

If within thirty (30) days of the date of this letter, you do not: (i) pay the above balance in full or (ii) notify PLA or have your bankruptcy attorney notify PLA of your open bankruptcy case, then pursuant to a resolution of Council Rock School District, additional costs of collection, including reasonable attorney fees, will be assessed and added to the amount due pursuant to the fee schedule set forth on the reverse side of this letter. You can also avoid the imposition of attorney fees by entering into a payment plan within thirty (30) days of the date of this letter.

Please note that if there are other fully or partially unpaid delinquent accounts being collected by PLA against the above-referenced property, regardless of when such accounts became delinquent, the fee schedule on the reverse side of this letter contains the fees that will be applicable to such accounts going forward and replaces any fee schedules you may previously have received.

See page 3 for information concerning payment plans and the PLA hardship program.

Page 1





Case 24-10440-amc Doc 66-2 Filed 01/29/25 Entered 01/29/25 18:01:08 Desc Exhibit B Page 4 of 7

Fee Schedule

COLLECTION FEES

At an hourly rate between

\$75.00-\$275.00 per hour

ACTION

	COLLECTION FEES
Validation notice	\$25.00
Notice of delinquent claim and fee shifting	\$40.00 per notice, plus
Rookkaaning foo for Dormand Die 62	applicable postage
Bookkeeping fee for Payment Plan of 3 months or less	\$25.00
Bookkeeping fee for Payment Plan more than 3 months	\$50.00
Handling Fee for Returned Check	\$25.00
ACTION	ATTORNEY FEES
Initial review and sending first demand letter	\$175.00
File lien and prepare satisfaction	\$250.00
Prepare Writ of Scire Facias	\$250.00
Research, prepare and obtain re-issued Writ	\$175.00
Prepare and mail letter under Pa. R.C.P. §237.1	\$50.00
Prepare Motion for Alternate Service	\$250.00
Prepare Praecipe to Amend	\$100.00
Prepare Motion to Amend	\$150.00
Prepare Motion to Consolidate Claims	\$250.00
Amend claim to Add United States as Defendant	\$250.00
Prepare Writ of Execution	\$800.00
Preparation for sheriff's sale; review schedule of distribution and resolve distribution issues	\$400.00
Prepare Motion to Continue sheriff sale	\$50.00
Prepare Petition for Free and Clear Sale	\$400.00
Preparation and service of Subpoena	\$100.00
Presentation of Motion or Petition	\$50.00

There may also be added to a delinquent account the costs, expenses and fees incurred in collection such as, but not limited to, postage, title searches, court fees and sheriff fees. Additionally, should a lien be filed, interest in accordance with 53 P.S. § 7143 of the Municipal Claims and Tax Liens Act will begin to accrue on the date of the filing of the lien and will continue to accrue on a daily basis, increasing the amount of the balance due.

The collection fees and the attorney fees listed above will be assessed only if the corresponding action is performed.

Council Rock School District

Services not covered above



	ayment Information and Options for Portnoff Law Associates, Ltd. (PLA)				
Reference	The following information should be referenced when contacting PLA:				
Information:	Property Address				
	8 Woodland Road, U Makefield Township, Pennsylvania				
	Property County Tax Parcel Number		File Number		
<u>.</u>	Bucks County 47-00	8-007-007	24-02364-0		
Website:	www.portnoffonline.com				
	You can look up your outstanding balance and print out a receipt of payment on PLA's website. To access look for the "Balance Inquiry" link.				
Telephone:					
Mail:	Portnoff Law Associates, Ltd. PO Box 3020	Please include y	your PLA File Number with your payment.		
Payment	Norristown, PA 19404-3020	(= 1 = 1 = 1 = 1 = 1 = 1			
By Mail:	Checks and Money Orders accepted via mail and	, t	tes, Ltd.		
	may be made payable to:	PO Box 3020			
		Norristown, PA 19404			
Other options:	You can make an electronic payment or explore other payment options on PLA's website at any time a www.portnoffonline.com on the "Make Payment" page.				

١	You may accept a payment plan listed below simply by making the first payment in the amount indicated on				
١	or before its due date; you do not need to call our office to confirm you are accepting a payment plan. Please				
١	note that if you make a payment in the exact amount set forth for a listed payment plan, we will assume you				
l	are accepting that plan unless your payment or correspondence with your payment indicates otherwise. Please				
retain this letter for your records; no additional payment plan confirmation letter will be sent to you.					
	3 Month Payment Plan A \$25 b - 11				
١	3 Month Payment Plan. A \$25 bookkeeping fee	6 Month Payment Plan. A \$50 bookkeeping fee			
١	will be added to the payment plan. The terms of	will be added to the payment plan. The terms of			
١	this payment plan are:	this payment plan are:			
١	\$22 144 11 due en ente-ferre I 20 2025	#11 FF (4 A)			

\$23,144.11 due on or before January 30, 2025 \$23,144.11 due on or before February 28, 2025 \$23,144.11 due on or before March 30, 2025 \$11,576.22 due on or before March 30, 2025 \$11,576.22 due on or before March 30, 2025 \$11,576.22 due on or before April 30, 2025 \$11,576.22 due on or before May 30, 2025 \$11,576.23 due on or before June 30, 2025

Once you accept a payment plan, it is your responsibility to make sure that your payments are received by this office on time. In the event you fail to make any payment on time, we reserve the right to rescind this payment plan without prior notice to you.

These are the terms that are available without the need to contact our office.

Payment Plan

Please note that even if you are on a payment plan, we reserve the right to file a lien against your property in order to secure our client's interest in the delinquent claim. If a lien is filed, the court costs incurred to file the lien will be added to the balance due and interest will accrue as permitted by applicable law.

If you are currently on a payment plan with PLA for other delinquencies, please note that the delinquency which is the subject of this letter is not included in that payment plan. If you have other delinquencies with PLA and would like to include all outstanding delinquencies in a single payment plan, you must contact PLA to establish such a payment arrangement.

PLA Hardship	Program
Eligibility:	Owner-occupants experiencing financial difficulties are eligible for our hardship program.
Application:	Hardship applications are available online at PLA's website or you can request an application from PLA by telephone.



Case 24-10440-amc Doc 66-2 Filed 01/29/25 Entered 01/29/25 18:01:08 Desc Exhibit B Page 6 of 7

P.O. Box 351 Norristown, PA 19404

24-02364-0_c0_BUZ_12312024

Southern Shoals 1457 Medinah Lane Murrells Inlet, SC 29576

NOTICE

Portnoff Law Associates, Ltd. (PLA) is a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.

If you currently are in bankruptcy, you may be entitled to certain protections pursuant to the bankruptcy laws. Please contact PLA, or if you are represented by counsel, have your bankruptcy attorney contact PLA, with your bankruptcy case number. If you previously filed for bankruptcy and received a discharge of your personal debts from the bankruptcy court, please be advised that any collection efforts PLA is pursuing on behalf of Council Rock School District are in rem, meaning that they are against the real property. In rem collection is not precluded by your discharge.

With the exception of the notice concerning the applicability of the fee schedule to other accounts, this letter applies only to the property and delinquency shown on page 1 of this notice. There may be other outstanding taxes and/or municipal claims due for this property or other properties that you own, including taxes and municipal claims that are not being collected by PLA. Kindly contact PLA for the current balance due on all other delinquencies being collected by PLA.

At this point, PLA is acting solely in its capacity as a debt collector and no attorney with this firm has reviewed the particular circumstances of your account.

Page 4



P.O. Box 351 Norristown, PA 19404 **USPS CERTIFIED MAIL**



9214 8901 9403 8395 0830 31

Southern Shoals 1457 Medinah Lane Murrells Inlet, SC 29576

